

1 Anna Y. Park, SBN 164242  
2 anna.park@eeoc.gov  
3 Nakkisa Akhavan, SBN 236260  
4 nakkisa.akhavan@eeoc.gov  
5 Andrea E. Ringer, SBN 307315  
6 andrea.ringer@eeoc.gov  
7 U.S. EQUAL OPPORTUNITY COMMISSION  
8 255 East Temple Street, Fourth Floor  
9 Los Angeles, CA 90012  
10 Telephone: (213) 785-3080  
11 Facsimile: (213) 894-1301

12 Sophie Tarazi, CA SBN 329721  
13 Sophia.tarazi@eeoc.gov  
14 U.S. EQUAL OPPORTUNITY COMMISSION  
15 550 W. C Street, Suite 750  
16 San Diego, CA 92101  
17 Telephone: (619) 900-1910

18 Attorneys for Plaintiff  
19 U.S. EQUAL OPPORTUNITY COMMISSION  
20

21 **UNITED STATES DISTRICT COURT**  
22 **CENTRAL DISTRICT OF CALIFORNIA**

23 U.S. EQUAL OPPORTUNITY COMMISSION,  
24 Plaintiff,

25 vs.

26 MEATHEAD MOVERS, INC., and  
27 DOES 1-10, inclusive,

28 Defendants.

Case No.: 2:23-cv-08177-DSF-AGR<sup>x</sup>

**DECLARATION OF EEOC  
ATTORNEY ANDREA RINGER IN  
SUPPORT OF PLAINTIFF EEOC'S  
MOTION TO STRIKE DEFENDANT  
MEATHEAD MOVERS, INC.'S  
AFFIRMATIVE DEFENSES**

Hon. Dale S. Fischer

Hearing Date: April 14, 2025

Time: 1:30 p.m.

Trial: August 18, 2026

1                   **DECLARATION OF EEOC ATTORNEY ANDREA RINGER**

2                   I, Andrea Ringer, am an Assistant Regional Attorney in the Los Angeles  
3 District Office of the United States Equal Employment Opportunity Commission  
4 (the “EEOC” or “Commission”) and represent the Commission in the above-  
5 captioned matter. I have personal knowledge of the facts set forth in this  
6 Declaration. I am competent to attest to these facts and would do so if called to  
7 testify.

8                   1.       The EEOC conducted an administrative investigation of Meathead’s  
9 compliance with the ADEA as part of its investigation of Directed Charge No.  
10 485-2018-00078.

11                  2.       The Charge alerted Meathead that the EEOC’s focus would be on  
12 Meathead’s compliance with the ADEA and its hiring practices companywide.

13                  3.       The EEOC’s administrative investigation included, but is not limited  
14 to, the following:

- 15                  a. Issuing at least three Requests for Information to Meathead seeking  
16 information regarding Meathead’s hiring and recruitment policies,  
17 forms, and trainings, employee lists, job postings, marketing  
18 materials, and employment applications;
- 19                  b. Interviewing the Chief Executive Officer, the Chief Financial Officer,  
20 the Chief Operating Officer, and the General Manager at Meathead;
- 21                  c. Reviewing Meathead’s Position Statement and other representations  
22 from Meathead regarding its hiring and recruitment practices and  
23 decisions;
- 24                  d. Reviewing Meathead’s employee list and thousands of applicant  
25 records and interview notes;
- 26                  e. Reviewing other documents produced by Meathead, including but not  
27 limited to, Meathead’s hiring and recruitment policies and forms,

1 employee lists, job postings, marketing materials, employment  
2 applications, interview notes, and employee handbook;

- 3 f. Sending questionnaires to thousands of applicants requesting  
4 information regarding their experience applying at Meathead and their  
5 age at the time, and reviewing hundreds of responses;  
6 g. Interviewing applicants regarding their experience applying at  
7 Meathead and their age at the time.

8  
9 Dated: March 12, 2025



*[Handwritten signature of Andrea Ringer]*  
/s/ Andrea Ringer

10 Andrea Ringer  
11 EEOC Attorney  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28